

KEKER & VAN NEST LLP
ROBERT A. VAN NEST - #84065
rvannest@kvn.com
CHRISTA M. ANDERSON - #184325
canderson@kvn.com
DANIEL PURCELL - #191424
dpurcell@kvn.com
710 Sansome Street
San Francisco, CA 94111-1704
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

KING & SPALDING LLP
SCOTT T. WEINGAERTNER (*Pro Hac Vice*)
sweingaertner@kslaw.com
ROBERT F. PERRY
rperry@kslaw.com
BRUCE W. BABER (*Pro Hac Vice*)
bbaber@kslaw.com
1185 Avenue of the Americas
New York, NY 10036-4003
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

KING & SPALDING LLP
DONALD F. ZIMMER, JR. - #112279
fzimmer@kslaw.com
CHERYL A. SABNIS - #224323
csabnis@kslaw.com
101 Second Street, Suite 2300
San Francisco, CA 94105
Telephone: (415) 318-1200
Facsimile: (415) 318-1300

GREENBERG TRAURIG, LLP
IAN C. BALLON - #141819
ballon@gtlaw.com
HEATHER MEEKER - #172148
meekerh@gtlaw.com
1900 University Avenue, Fifth Floor
East Palo Alto, CA 94303
Telephone: (650) 328-8500
Facsimile: (650) 328-8508

Attorneys for Defendant
GOOGLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 3:10-cv-03561 WHA

**GOOGLE INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

Judge: The Honorable William Alsup

Pursuant to the Northern District of California's Civil Local Rules 7-11 and 79-5, Defendant Google Inc. ("Google") hereby brings this Administrative Motion to Seal the following material designated by Oracle as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this case [Dkt. No. 68.]:

- Exhibits B and E to the Declaration of Daniel Purcell in Support of Google's Supplemental Brief in Support of Motion *in Limine* No. 3.

The above-referenced exhibits contain Google's sensitive, non-public financial information, the release of which would cause great and undue harm to Google. Declaration of Reid Mullen ("Mullen Decl.") in Support of Google's Administrative Motion to Seal at ¶¶ 2-3. Google takes no position as to whether disclosure of the parts of these exhibits that do not include Google's sensitive financial information would cause harm to Oracle.

Google also moves to seal the following material designated by Oracle America, Inc. ("Oracle") as "Confidential" or "Highly Confidential – Attorneys' Eyes Only":

- Lines 2:6; 3:4-9; 3:13-23; 4:1-14; 4:20-25; 5:4-14; 7:17-19; 7:25-26; 8:1-3; 8:6-13; 8:15-22; 9:1-3; 9:5-9; 9:11-12; 10:3-5; 10:8-19; 11:22-23; 12:22-28; 13:1-11; and 15:18-19 of Google's Supplemental Brief in Support of Motion *in Limine* No. 3.
- Exhibits A, C and D to the Declaration of Daniel Purcell in Support of Google's Supplemental Brief in Support of Motion *in Limine* No. 3.

Google takes no position as to whether disclosure of these materials would cause harm to Oracle, and Google would not oppose an order requiring Oracle to make that information public. Mullen Decl. ¶ 4.

Dated: October 20, 2011

KEKER & VAN NEST LLP

By: /s/ Daniel Purcell

DANIEL PURCELL
Attorneys for Defendant
GOOGLE INC.